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Attorneys for Defendants:
KAISER FOUNDATION HOSPITALS;
THE PERMANENTE MEDICAL GROUP, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO

JAMES PEARSON,

Plaintiff,

v.

KAISER FOUNDATION HOSPITALS;
THE PERMANENTE MEDICAL
GROUP, INC., a Corporation doing
business in the State of California;
COMMONSPIRIT HEALTH, a Colorado
corporation, d/b/a ST. JOSEPH'S
BEHAVIORAL HEALTH; and Does 1
through 20, inclusive

Defendants.

Case No. 2:20-CV-02335-MCE-KJN

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE THAN
28 DAYS (LOCAL RULE 144(A)) AND
ORDER**

Complaint filed on 11/23/20

IT IS HEREBY STIPULATED, by and between plaintiff JAMES PEARSON and
defendants KAISER FOUNDATION HOSPITALS and THE PERMANENTE MEDICAL
GROUP, INC. (referred to herein as "KAISER DEFENDANTS"), through their
undersigned counsel, that the KAISER DEFENDANTS may have until January 4, 2021 to
file a responsive pleading to plaintiff's Complaint. The extension is necessary to allow the
KAISER DEFENDANTS time to obtain information needed to respond to the Complaint.
This extension does not exceed the twenty-eight (28) days allowed under Eastern District

1 Local Rule 144(a). This is the first stipulation for an extension of time between the parties.
2 Pursuant to Local Rule 144(a), approval of this stipulation by the Court is not necessary.

3 **IT IS SO STIPULATED.**

4 DATED: December 15, 2020

BUTY & CURLIANO LLP

6 By: /S/ Ondrej Likar
7 JASON J. CURLIANO
8 ONDREJ LIKAR
9 Attorneys for Defendants:
10 KAISER FOUNDATION HOSPITALS;
11 THE PERMANENTE MEDICAL GROUP, INC.

12 DATED: December 15, 2020

ALLACCESS LAW GROUP

13 By: /S/ Irakli Karbelashvili [as authorized on 12/14/2020]
14 IRAKLI KARBELASHVILI
15 Attorneys for Plaintiff:
16 JAMES PEARSON

17 **IT IS SO ORDERED.**

18 **Dated: December 16, 2020**

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20 MORRISON C. ENGLAND, JR.
21 SENIOR UNITED STATES DISTRICT JUDGE
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